

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

EDWARD R. HILLS, *et al.*,

Defendants.

Case No. 1:16-CR-00329

Judge Sara Lioi

**DEFENDANT DR. YAZAN AL-MADANI'S MOTION FOR LEAVE TO RESPOND TO THE
SUPPLEMENTARY BRIEF AND EXHIBITS OF THE GOVERNMENT**

Now comes Defendant Dr. Yazan Al-Madani, through undersigned counsel, and respectfully moves for leave to respond the Supplementary Brief and Exhibits filed by the government after the sentencing hearings on Friday, February 15, 2018. Counsel is requesting seven (7) additional days to Friday, March 1, 2019. Counsel states that he had several court hearings during the week of February 18-22, 2019 in state and federal immigration courts which prohibited him from responding to the government's memorandum and was unable to schedule an appointment with his client to confer due to his current incarceration in Youngstown, Ohio.

Respectfully submitted,
/s/ Richard H. Drucker

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CERTIFICATE OF SERVICE

I certify that on February 7, 2019, I electronically filed the foregoing Supplementary Sentencing Memorandum with the Clerk of the United States District Court for the Northern District of Ohio, Eastern Division by way of the CM/ECF system, which automatically will serve this document on the attorneys of record for the parties in this case by electronic mail.

Respectfully submitted,

/s/ Richard H. Drucker, Esq.

Richard H. Drucker, Esq. (Ohio Bar No. 0002466)
Attorney for Defendant Dr. Yazan Al-Madani